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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 21-cr-429 YGR
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	CONTINUING STATUS CONFERENCE AND
v.)	EXCLUDING TIME UNDER THE SPEEDY TRIAL
)	ACT
RAY GARCIA,)	
)	
Defendant.)	

A status conference in the above-captioned case is scheduled for May 5, 2022. Counsel for the United States and counsel for the defendant jointly stipulate and request that that status conference be continued to May 11, 2022, and that time be excluded under the Speedy Trial Act from May 5, 2022 to May 11, 2022.

The Court has notified the parties that the Court is unavailable on May 5, 2022. The government and counsel for the defendant have agreed that time be excluded under and the Speedy Trial Act so that defense counsel can continue to prepare. The government has produced voluminous discovery to defense counsel. For these reasons, the parties stipulate and agree that excluding time until May 11, 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The

1 parties further stipulate and agree that the ends of justice served by excluding time from May 5, 2022 to
2 May 11, 2022, from computation under the Speedy Trial Act outweighs the best interests of the public
3 and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

4 The undersigned Assistant United States Attorney certifies that she has obtained approval from
5 counsel for the defendant to file this stipulation, request, and proposed order.

6
7 IT IS SO STIPULATED.

8
9 DATED: March 24, 2022

/s/ Molly K. Priedeman
MOLLY K. PRIEDEMAN
Assistant United States Attorney

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11
12 DATED: March 24, 2022

/s/ James Reilly
JAMES REILLY
Attorney for the Defendant

PROPOSED ORDER

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time from May 5, 2022 to May 11, 2022, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from May 5, 2022 to May 11, 2022, from computation under the Speedy Trial Act outweighs the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 5, 2022 to May 11, 2022, shall be excluded from computation under the Speedy Trial Act and the status conference is continued to May 11, 2022.

IT IS SO ORDERED.

DATED: March 24, 2022


THE HONORABLE VONNE GONZALEZ ROGERS
United States District Judge